

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

RECEIVED
MAR 16 AM 10:11
U.S.D. DISTRICT COURT
FLORENCE, SC

Anthony Lamar Wright
[Enter the full name of the plaintiff in this action]

Civil Action No. 4:16-cv-00218-TLW-TER
(to be assigned by Clerk)

v.
Dr. Darby in his individual capacity, Dr.
Randolph in his individual capacity, Dr. Grant
in his individual capacity, Sheriff Strickland
in his individual capacity, Sheriff Kopp in his
individual capacity, Sheriff Leonotis in his individual
[Enter above the full name(s) of defendant(s) in this action]

COMPLAINT
Federal Prisoner

I. PREVIOUS LAWSUITS

- A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise related to your imprisonment? Yes No X
- B. If your answer to A is Yes, describe the lawsuit in the space below. If there is more than one lawsuit, describe the additional lawsuits on another piece of paper using the same outline.

1. Parties to this previous lawsuit:

Plaintiff: 2/9

Defendant(s): 2/9

2. Court: 2/9

(If federal court, name the district; if state court, name the county)

3. Docket Number: 2/9

4. Name(s) of Judge(s) to whom case was assigned: 2/9

5. Disposition: 2/9

(For example, was the case dismissed? Appealed? Pending?)

6. Approximate date of filing lawsuit: 2/9

7. Approximate date of disposition: 2/9

II. PLACE OF PRESENT CONFINEMENT

A. Name of Prison/Jail/Institution:

Charleston County Detention Center
Colleton County Detention Center, Lexington County Jail, Alvin S. Glen Detention Center

B. What are the issues that you are attempting to litigate in the above-captioned case?

Cruel and unusual punishment, medical deprivation, mental anguish

C. (1) Is there a prisoner grievance procedure in this institution? Yes ☒ No ☐(2) Did you file a grievance concerning the claims you are raising in this matter? Yes ☒ No ☐

When 3/15 and 3/16

Grievance Number (if available) never assigned

D. Have you received a final agency/departmental/institutional answer or determination concerning this matter (i.e., your grievance)? Yes ☒ No ☐

E. When was the final agency/departmental/institutional answer or determination received by you?

If possible, please attach a copy of your grievance and a copy of the highest level decision concerning your grievance that you have received.

F. If there is no prison grievance procedures in this institution, did you complain to prison, jail, or institutional authorities? Yes ☒ No ☐

G. If your answer is YES:

1. What steps did you take? I filed several request of staff and a couple grievances.
2. What was the result? I have been ignored by all three jails or detention centers.

III. PARTIES

In Item A below, place your name, inmate number, and address in the space provided. Do the same for additional plaintiffs, if any.

A. Name of Plaintiff:

Anthony Lamar Whight

Inmate No.:

286740

Address:

Lexington County Detention Center 521 Gibson Road, Lexington, SC 29024

In Item B below, place the full name of the defendant, his official position, and place of employment in the space provided. Use Item C for additional defendants, if any.

B. Name of Defendant:

Dandy

Position:

Doctor

Place of Employment:

Lexington County Detention Center

C. Additional Defendants (provide the same information for each defendant as listed in Item B above):

~~Alvin S. Glen~~ Randolph, Doctor, Alvin S. Glen Detention Center, ~~Alvin S. Glen~~ Doctor, Colleton County Detention Center, ~~Alvin S. Glen~~ Sheriff, Colleton County, ~~Alvin S. Glen~~ Sheriff, Lexington County, ~~Alvin S. Glen~~ Sheriff, Richland County

IV. STATEMENT OF CLAIM

State here, as briefly as possible, the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach an extra sheet if necessary.

While incarcerated in Colleton County under the care of Dr. Grant for all my medical needs I was denied my medication for multiple sclerosis leaving me suffering extreme pain and mental anguish.

While incarcerated in Richland County under the care of Dr. Randolph for all my medical needs I was denied my medication for multiple sclerosis leaving me suffering extreme pain and mental anguish.

While incarcerated in Lexington County under the medical care of Dr. Dardy for all my medical needs I was denied my medication for multiple sclerosis leaving me suffering extreme pain and mental anguish.

At all three detention centers I was left very off balance, falling at times hitting my head, and I was always in constant pain. All officers always left the burden to provide medical treatment on the doctors with no remedy for the suffering I was experiencing. I was always pleading for mercy though none ever came at either location but abuse did come from the officers verbally and some times physically.

The denial of my medication has left me very off balance. I loss count of the head injuries I have received due to the off balance living the medical denial caused by being improperly administered for me. The verbal abuse from the nurses was more vulgar than

IV. STATEMENT OF CLAIM - continued.

that of the inmates I was housed with.

When incarcerated in Colleton County Detention Center I was victim to racist comments every time an officer turned their backs to Nurse Herndon while she was suppose to be conducting medical services to me which was nearly daily. One of her former black friends did something ugly to her leaving me the subject of her harsh remarks and care.

While incarcerated in Colleton County under the authority of Sheriff Strickland his grievance system for inmates was intentionally hardly answer due to the ignoring of all serious grievances by the Sheriff if the grievances made it to the Sheriff's office which mine was one that didn't.

I like the majority of inmates whom filed grievances or served time under the office of Sheriff Koon couldn't tell you how he looks, but they can tell you how their grievances went unanswered. Grievances to Sheriff Koon's office from me were never answered like many inmates.

Sheriff Lott's policy for anything his staff can not answer is to ignore it. Sheriff Lott's policy when it came to my medication due to the cost was the same as Sheriff Strickland's and Sheriff Koon's which was, "if you need it here your family bring it from home because we won't provide any expensive medication."

The staff of the three sheriffs mentioned are all the same as the sheriffs whom had the final say about

ALW

ALW

prescription purchases which in my case never occurred. I was left the laughing victim of Colleton, Richland, and Lexington County Jails where I remained at least a month being denied my disease modifying therapy for Multiple Sclerosis.

While in Lexington County the worst of the three housing wise I was forced to sleep on the floor where I woke up in a puddle of water due to the toilet leaking. I slipped in the water adding another injury to the numerous injuries from falling from being off balance due to my equilibrium becoming more skewed because of the continued denial of my medication which led to my left leg and ankle injury.

The times I was not in jail I hardly ever miss a dose of medication due to me having a stock pile of medication for times like when I was in jail or prison. When I was in prison I hardly ever missed an injection of my disease modifying medication like I did in these three county jails.

There is a lot more but the severity of it all on my emotions and mind is more than I can handle. So Lord willing all will be handled in front of a jury of my peers.

Respectfully I Am,

V. RELIEF.

State briefly and exactly what you want the court to do for you.

I want the court to grant me a jury trial so all the facts will be known to all involved. I also need an attorney to be appointed as my mental ability as proven in my only other civil suit by Dr. Kusack's sworn deposition as an expert. Dr. Kusack swore under oath I would be incapable of handling a case without an attorney. My vision, failing health, and poor mind state has cause my dependency on inmates to read and write for me. Additionally I'm on mental health medication.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this

day of

March 20 16th

Signature of Plaintiff

As started at the conclusion^{DX} my initial filing of my original Complaint filed around January 13, 2016, I would finish staging my claim later.

Defendants mention here now are just as liable or more as the original defendants. Defendant Sgt. Holley who works Secerity, Not medical decided ignorantly to make a judgement call about my health before defendant Dr. Darby decided to prescribe me a much needed steroid injection, Sgt. Holley jumped to the conclusion that I was faking my poor health, And grabed me forcefully slung me into my cell causing me to fall face first into my steel bed producing a bloody mouth, A injured hand and arm, As well as a bruised knee.

Defendant correct care solutions employs, All medical personell for lexington county. correct care solutions has denied the purchbe of my disease modifying medications as well as their substitute steroid injection.

Southern health partners whom is the medical athority for docter grant and Southern health partners denied

the purchasing my disease modifying medication, In violation of my constitutional rights, leaving me in exstream pain and mental Anguish.

Defendants Dr. Chavez is a Doctor for lexington county detention center with the head medical athority onsite at the detention center. Dr. Chavez has violated my constitutional rights by denying my proper medical treatment leaving me in exstream pain and mental Anguish.

Defendant nurse Herdon whom works under Dr. Grant denied proper medical treatment to me leaving me in exstream pain and mental Anguish.

The medical providers for charlston county detention center denied me proper medical treatment the whole time I was housed there, leaving me in excruciating pain and mental Anguish.

Sheriff J. al cannon Jr. has the final say over all medical purchases and he contributed to the devil of my proper medical treatment, leaving me suffering exstream pain and mental Anguish.

4:16-cv-00218-TLW Date Filed 03/16/16 Entry Number 13 Page 9 of 10

These people treat me as if I'm not human since I was incarcerated and they are absolutely wrong, I am still protected by the same rights soldiers are fighting wars to protect us, notice I said us proving I give common courtesy even to those who deny my rights, I am still suffering their callous indifference as if I was not a taxpayer where the funds for my life saving treatment derives from.

Several years of normal health and life expectancy has been shaved from my life as if I don't matter, and am not worthy of advances of science, the conduct of all said to be, but are not medical professionals is shocking as they could clearly see the rapid declining of my health and could authorize the needed treatment to confirm reasons for my failing health and prevent further failings. It's clear all involved in my care had a moral obligation to provide a disease modifying therapy as recommended by (M.S) Multiple Sclerosis Expert Opinion Panel.

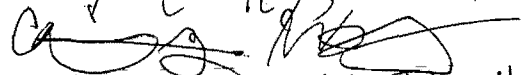
I am UNaware of any assistance
Sought from the Scientific Communitys
I feel because of my incarcerated
record Im denied equal rights.

I Find it appaling how the
govener never addressed the neglected
medical treatment of South carolina
Prisoners, state, and county, with poor
ethics used by the counties who abused
and violated my rights.

The State paper shows more mercy
for a red tailed hawk than for a Man,
Me, with debilitating health.

I am tempted to begin a Statewide
battle against medical deprivation
Just as a soldier began introducing
a nationwide battle against the
invisible wounds of war, I suffer
Invisible neurological wounds.

Respectfully,



Anthony L. Wright 286 74028-9
Lexington County Detention Center
521 Gibson Road
Lexington, South Carolina 29102